

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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INSPIRED PURSUITS, LLC,  
QUALTIM, INC., CENTER FOR  
BUILDING INNOVATION, LLC,  
DRJ ENGINEERING, LLC, KIRK  
GRUNDAHL, and SUZANNE  
GRUNDAHL,

Case No. 3:25-cv-00075-wmc

Plaintiffs,

V.

PARAGON COMPONENT SYSTEMS, LLC,  
JOHN HOLLAND, JAMES HOLLAND,  
CLEARSPAN COMPONENTS, LLC,  
ANDREW EWIN, DAVID REED, SCOTT  
HOELSMA, SETH DUNCAN, MICHAEL  
PITTS, AVERY RADMACHER, NATHAN  
BIERMEMA, JEREMY BIEREMA, ROB  
EASON, and THE ESTATE OF DANIEL  
HOLLAND EX REL. SPECIAL  
EXECUTOR MARVIN B. SPEED,

Defendants.

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**DEFENDANT'S MOTION FOR LEAVE TO FILE A ONE-PAGE  
SUR-REPLY IN OPPOSITION TO MOTION TO REMAND**

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Under Federal Rule of Civil Procedure 7(b), Defendant Paragon Component Systems, LLC (“Paragon”) respectfully seeks leave to file a one-page sur-reply in opposition to Plaintiffs’ reply to their motion for remand. Doc. 38. There is good cause for this request, and the circumstances requiring the request are rare and unusual. Paragon maintains that the requested relief is necessary to point out a new argument raised in Plaintiffs’ reply, which is directly inconsistent with Plaintiffs’

representations to the Court, and which would assist the Court in its decisional process. A proposed sur-reply is attached as Exhibit A.

Respectfully submitted this 25<sup>th</sup> day of April 2025.

**GASS TUREK LLC**

*Counsel for Defendants Paragon Component Systems, LLC and John Holland*

s/ Tamar B. Kelber

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